

COD Implementation Plan Change History Log

	Suggested Changes	Section	Page	Author	Date	Change Made Y/N	Comments
1	Section 1.2.1 states that RFMS will be retired in Dec. 2002 and LOS will be retired in Sept. 2003. I believe there is a requirement for both of these systems to function up to five years after an award year ends for audits, close-outs, and corrections. (The Implementation timeline on page 8 lists the Conversion of Historical Legacy Data as a task. This may negate the previous comments). It also states that the new CBS will interface with COD to populate the FISAP. Does that mean the Campus-Based Origination and Disbursement is no longer part of COD?	1.2.1	3	Frank Kidd	9-Jan	Y	We are discussing data conversion and retirement dates with Pell and Direct Loans currently to determine what are the current requirements (as a result, no change to the document made as of this point). However, document changed to indicate that COD will receive student-level campus-based records and will aggregate and send these to COD for FISAP pre-population.
2	Will Pell and Campus-Based be on different Systems?	1.2.1	3	Julie Bryant	9-Jan	Y	Yes, the Campus-based system is being re-platformed and an interface will be developed between CBS II and COD. Pell will be on COD. However, COD will receive student level campus-based records and will aggregate this information and send to CBS II for FISAP pre-population (see comment #1).
3	The Implementation Plan seems to reflect an assumption that RFMS processing for an award year ends in December and that schools are closed out no later than December of each year. Post deadline processing for RFMS begins October 1 of each year and can last through January or beyond. The migration strategy and RFMS retirement must accommodate post deadline processing.	1.2.1	3	Karen Sefton	9-Jan	N	At this point we are discussing this with DL and Pell on data migration and retirement of these systems. As the approach is developed, the implementation workplan will be modified.

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4	Section 1.2.2.1 implies the COD will be developed and operated at the solution partner's facility and states the schools will be to connect to both the VDC and the solution partner's facility. This conflicts with the IT Services policy of having all development occur on VDC hardware and having all systems/servers at the VDC.	1.2.2.1	4	Frank Kidd	9-Jan	Y	See Steve Hawald's comment (#110)
5	The diagram needs to have some sort of captions like old and new. Also, where is the SFA feed?	1.2.2.1	4	Julie Bryant	9-Jan	Y	Changes were made to the caption on the diagram. However, the diagram is only intended to show how schools connect to these systems currently, not how other SFA systems interface with these 3 systems, so no SFA feed was added.
6	We need reality checks on EAI schedules, particularly VPN replacing TIVWAN and middle ware. The Implementation Plan very clearly states that the COD strategy assumes EAI components will be in place prior to COD test and implementation. There must be contingency plans using the current architecture and system interfaces. We also need reality checks on the FMS progress and schedule. FMS is publishing July 2001 for implementing with RFMS. Since there have been few meetings, and not much resulting from the meetings, July appears to be at risk. Contingency planning for the current GAPS environment is needed.	1.2.2.1	4	Karen Sefton	9-Jan	Y	Correct, we are working with the current Mod Partner EAI team to check their schedule, and are beginning to work with FMS on the progress of their schedule.

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7	The Implementation Plan states that the MSP will operate COD from its facility rather than from the VDC. An MOU with the VDC needs to be in place as soon as possible to ensure VDC readiness and cooperation.	1.2.2.1	4	Karen Sefton	9-Jan	N	Noted, will be coordinated with the VDC liaison.
8	Will FMS get info before COD feed? Not clear in diagram. On the next diagram it shows COD and Non-COD coming out of Internet VPN, I am not sure if that clarified it for me or made me more confused?	1.2.2.1	5	Julie Bryant	9-Jan	Y	This diagram is not intended to show a hierarchy diagram in any sequencing order, therefore FMS does not get the information before COD. The diagrams have been updated to clarify the use of the VPN.
9	Section 1.2.2.1 Interface to Other SFA Applications states "the distinction between using TIVWAN versus the VPN is transparent to the Schools." Schools will have to change their software unless the TIVWAN destination points and TG number scheme is to be used by the VPN (I don't think it is).	1.2.2.1	5	Karen Sefton	9-Jan	Y	Removed the sentence suggesting that Schools were transparent.
10	It also states that systems which COD interfaces will need to be connected to the EAI Bus by mid to late 2001 and implies that schools will be to convert from the TIVWAN to the VPN before using COD. I consider this assumptions risky, especially if other systems don't get on the EAI Bus until late 2001 because it leaves little time for integration testing with COD. The January 31, 2001 deadline for the Common Record format, stated on page 17 may also be risky.	1.2.2.1	6	Frank Kidd	9-Jan	N	We realize there are some risks in these dependencies and are working with both the Modernization Partner EAI team and the Common Record team to stay on top of schedules for completing these activities.

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11	Gantt chart appears to be extremely ambitious, especially Middleware test scheduled from 5/18 - 2/25. How many other systems have to be connected to Middleware by then, and how to we work around their peaks and startups?	1.3	8	Frank Kidd	9-Jan	N	No connections are needed to the EAI Bus for us to convert current legacy systems into the common record. The EAI bus will pull data directly off the TIVWAN and therefore will not need other systems connected to the EAI bus for the middleware to work.
12	Add a more detailed Implementation Timeline after the high-level timeline and include Campus-based information, timeframes for the current contracts to the legacy systems, and requirements gathering.	1.3	8	Mary Haldane	9-Jan	Y	Text and timeline for developing FISAP functionality in the re-platformed Campus-Based II application was added at the end of this section. After discussion, Mary agreed that timeline for current legacy contracts and requirements gathering can be added in a later release of the implementation plan.
13	Regardless of when we retire RFMS and LOS, there will be transactions that occur for a post retirement year. There should be a method to record those transactions in the FMS and transmit them to DLSS.	1.3	9	Ron Ackermann	9-Jan	N	Requirement noted. The data migration plan to be developed later will address these issues in detail. The implementation plan has tasks to develop this plan but not details about the plan itself at this point.
14	FMS Deployment- Remove "need to interface" in the first sentence.	1.3	10	Denise Merchant	9-Jan	Y	
15	FMS Deployment, Responsibility should include CFO	1.3	10	Julie Bryant	9-Jan	Y	
16	Omit the first "interface."	1.3	10	Mary Haldane	9-Jan	Y	

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17	"TIVWAN replacement" should include SFA/CFO since funding transactions will be dependent on the TIVWAN replacement.	1.3	10	Ron Ackermann	9-Jan	Y	
18	"FMS Deployment" should include CFO/FMS	1.3	10	Ron Ackermann	9-Jan	Y	
19	"Connection of COD Interfacing Systems to EAI" needs SFA/CFO involvement.	1.3	10	Ron Ackermann	9-Jan	Y	Added
20	Section 1.4.1 Managing Phase includes the COD Project Management Task for monitoring project status, managing and measuring team performance and quality. Suggest that SFA be added as performing this task and that the performance measures be identified quickly. There were early signs that the workgroups were behind and not functioning well, but corrective action was slow/absent.	1.4.1	12	Karen Sefton	9-Jan	Y	Correct, the performance measures will need to be identified quickly and up front if we are to be successful. Document changed to indicate that SFA is also part of project management.
21	First paragraph, last line, omit the second "the."	1.4	12	Mary Haldane	9-Jan	Y	
22	Why is SFA not checked for COD Project Management?	1.4.1	12	Mary Haldane	9-Jan	Y	

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23	Overall Assumptions for the COD Development states that operating COD beyond deployment is not covered in the Plan. Need to define how the Operations Phase will be supported-will MP procure for these services or is this an SFA responsibility?	1.4.2	13	Karen Sefton	9-Jan	N	The business case for COD identifies that the COD solution partners (including Modernization Partner) will operate the COD system beyond deployment in what will be a shared-in-savings and value-based arrangement with SFA. This business case with the shared-in savings and value-based arrangement is being developed now and is expected to be finalized in May.--- Will not have to procure
24	Gap analysis is needed between the COD Solution Provider(s) software and the RFMS and LOS. The Plan has the end date of this task as March 1. Gap analysis is time consuming and detailed and will take the most knowledgeable systems people working along side the Solution Provider. This team needs to be pulled together quickly.	1.4.2	13	Karen Sefton	9-Jan	N	Yes, this is a concern at this point. We need to have the COD Solution Providers on board to begin this analysis and believe they will be part of our team by the end of January.
25	First bullet on page 14, who is the COD Team. It needs to be defined	1.4.2	13	Mary Haldane	9-Jan	Y	Changed to indicate Modernization Partner instead of COD team.
26	1.4.2: second bullet on page 14, CAMs and TOs have not been committed so reword to say: "SFA staff ..."	1.4.2	13	Mary Haldane	9-Jan	Y	

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27	Page 14 states that CAMs and Regional Training Officers will conduct School Training. Page 17 has a Common Process task that shows the MP and the CSP as fully responsible for developing training, user procedures. Need to clarify which organizations are involved in developing training materials. If SFA is to be involved, need to get with them soon. SFA University, home of the Training Officers, currently contracts out curriculum development and training material production. Need to get with SFA U. soon in order to ensure COD is included in their procurement plans. Also need to start identifying conferences, meetings, other opportunities for spreading the word to Schools, 3rd Party vendors, servicers. They "revolted" at the last 3rd Party conference for being left out of COD.	1.4.2	14	Karen Sefton	9-Jan	Y	<p>Modernization Partner will be responsible for developing the materials and curriculum needed for COD specific training. Modernization Partner will also use a "train the trainer" strategy to train SFA personnel in order for them to train schools, etc.</p> <p>SFA University will be responsible for delivering training that is not specific to COD (e.g. internet training).</p> <p>A communication plan is being developed for COD which includes the third party vendors, schools, and servicers.</p>
28	Page 14 lists the tasks and parties responsible in the Analysis Stage. This stage is scheduled to begin March 1, which seems way too late. In any case, the SFA and MP people who are going to work on these tasks need to be named/hired.	1.4.2	14	Karen Sefton	9-Jan	N	We are working with Mary to get SFA personnel staffed as soon as possible. March 1 was chosen as the start date because it is after the end of the current task order. We will begin any tasks possible before that point.
29	Second bullet – CFO needs to be involved in school training as it relates to school reconciliation and funding. I would think the CSP would also be involved in training.	1.4.2	14	Ron Ackermann	9-Jan	Y	Was changed to indicate SFA Staff - from Mary Haldane (See Comment 26)
30	Why is SFA not checked for Design Technology Infrastructure?	1.4.2	15	Mary Haldane	9-Jan	Y	This infrastructure is the design infrastructure at the solution partner's location which is outside the scope of SFA infrastructure. There will be coordination with SFA but not a major role here.

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31	The Assumptions for the Development of the Common Record include an assumption that the Common Record will be defined by January 31. This date needs to be validated and the Common Record Workgroup needs to meet. A huge impact on this workgroup is that there is little output from the edit workgroups.	1.4.2	17	Karen Sefton	9-Jan	N	We received this date from this Workgroup and are following-up with them on their progress. Karen inquired about how the Common Record will be validated.
32	“Build and Test Application and Performance Support – shouldn’t there be SFA involvement also, particularly as it relates to training and user procedures?”	1.4.2	17	Ron Ackermann	9-Jan	Y	
33	Same as #7-“Build and Test Application and Performance Support – shouldn’t there be SFA involvement also, particularly as it relates to training and user procedures?”	1.4.2	19	Ron Ackermann	9-Jan	Y	
34	Need to be careful in "selling" COD. RFMS processes originations and disbursements four times each day and the web product accesses this real-time. Assumptions on page 20 assume that COD will be first time schools see "real-time data.	1.4.2	20	Karen Sefton	9-Jan	N	Assumptions on page 20 are not meant to imply that this is the first time schools will see "real-time" data, but that this on-line access capability will allow schools to see real-time data in COD.
35	Fourth bullet under assumptions – need to mention FMS for funding.	1.4.2	20	Ron Ackermann	9-Jan	Y	Changed. The current plan involves schools going through the GAPs website. There are plans for replacing that with SFA/FMS website which would require SFA customer service
36	Bullet starting with “Reconciliation” who will be doing that? Typically monetary amounts are reconciled by Accounting Division.	1.4.2	21	Julie Bryant	9-Jan	Y	This bullet refers to reconciled performed by schools and has been changed to reflect this.

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37	Unclear if the "on-line access" and "screens" referred to throughout are web-based. Both LOS and RFMS has web products schools like.	1.4.2	21	Karen Sefton	9-Jan	Y	The on-line access section is for the development of a web-based interface for COD.
38	Add to "Assumptions for Development of On-Line Access – online funds drawdown capability. Although this will be an FMS function, access to the system should be through the same mechanism as the other COD functions.	1.4.2	21	Ron Ackermann	9-Jan	N	We consider this as a decision that still needs to be determined and will be decided during the Analysis and Design stages.
39	Add to "Assumptions for Development of On-Line Access – online information on funding transactions and reconciliation reports.	1.4.2	21	Ron Ackermann	9-Jan	Y	Added. We consider this as a decision that still needs to be determined and will be decided during the Analysis and Design stages.
40	same as #7-“Build and Test Application and Performance Support – shouldn’t there be SFA involvement also, particularly as it relates to training and user procedures?	1.4.2	22	Ron Ackermann	9-Jan	Y	
41	Under Assumptions, you omit FMS when referring to the other connection and interface systems. Was this intentional?	1.4.2	18	Julie Bryant	9-Jan	N	Yes, this section is for development of the Common Process which has interfaces for CPS and PEPS. The interface for FMS is mentioned in the assumptions for Fund Accountability.

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42	Expectation of data conversion is unclear. Plan assumes converting only 2001-2002 RFMS data-why not 1999-2000 and 2000-2001 since that would be the full set of RFMS data?	1.4.2	23	Karen Sefton	9-Jan	N	Plan has conversion of both RFMS and LOS data prior to 2001-2002 in one step (6th row), and conversion of 2001-2002 for both RFMS and LOS once post-deadline processing for each program is complete (rows 7& 8). We are discussing this with DL an Pell on data migration and retirement of these systems. As the approach is developed, the implementation workplan will be modified
43	1.5.1 the second paragraph needs to include users or super-users in testing.	1.5.1	26	Julie Bryant	9-Jan	N	Users will be formally involved in the Acceptance Testing process, but the component test and integration test are performed by the application developers.
44	Next paragraph same section, why will acceptance testing not be performed for middleware? Will it be done previously?	1.5.1	26	Julie Bryant	9-Jan	Y	Data is validated via component and integration tests. Since the middleware works behind the scenes to create the common record from incoming legacy records, there is no acceptance testing per se since there are no user facing screens for this process. Text was changed to clarify this point.

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45	1.5 Testing Approach. "Acceptance tests are not performed for development of the middleware to create common record from legacy records or for data conversion." How is data validated if not tested?	1.5	26	Karen Sefton	9-Jan	Y	<p>Data is validated via component and integration tests. Since the middleware works behind the scenes to create the common record from incoming legacy records, there is no acceptance testing per se since there are no user facing screens for this process.</p> <p>However, the common record is tested during the development of the common process where acceptance testing is performed.</p>
46	I got a little confused about what capabilities you were referring to, the five listed or the three in the paragraph? I deduced it was the 5 listed.	2	27	Julie Bryant	9-Jan	Y	The definition of a capability is the combination of the 3 items: Human Performance, Business Process, and Technology. For COD we have identified 5 capabilities (each involves the 3 items).
47	Where is the connection to SFA in Figure 5?	1.5.2	27	Julie Bryant	9-Jan	N	SFA will be connect to COD via the On-Line Access capability. This diagram is intended to illustrate the technical infrastructure for creating the common record for test, not connection to SFA users.

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48	For the test repository, what frequency will test data be pulled? Be sure to include peak and non-peak times.	2	28	Julie Bryant	9-Jan	N	This will be determined as the approach for implementing middleware is developed in more detail going forward.
49	<p>Under the core capability CONSISTENT DATA MANAGEMENT, the plan does not appear to provide adequately for ensuring data integrity and quality. At first glance, it doesn't seem necessary, because (a) data quality in the legacy delivery systems has been high and (b) the efforts of the COD workgroups on the common record and program edits has been high-quality and will undoubtedly continue in that vein.</p> <p>However, the COD common record utilizes fields from PEPS, the bedrock system for school eligibility. I'm not aware that PEPS has been a COD focus yet, so the mod partner may not be fully aware that the data quality issues are very different in this management information system, that hasn't ever driven funding directly up to this point (i.e., the stakes have been lower).</p>	2	29	Kitty Wooley	9-Jan	N	Comment noted, we will log the risk and investigate further. No change needed to document.

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50	<p>I do not know the status of the OIG data quality assessment of PEPS; however, the COD implementation plan should include at a minimum a plan for communication between the COD implementation team, the PEPS Division, and Case Management & Oversight, so that the COD Team knows (a) what the OIG's findings were as they relate to the PEPS fields that are in the common record and (b) what the School's Channel's new plan is for ensuring accuracy in these fields. But I think the plan should include more than that minimum.</p> <p>Reasoning: If all of the common record's PEPS fields were populated by schools via the E-App web page, the schools would own the data quality issues; however, numerous SFA users input data into the eligibility module. The PEPS Division has done fabulous documentation and training around the country on "how to enter data," but there has not been an authoritative voice within SFA on "what one MUST do" since before the IPOS reorganization in 1996. That lack has had an impact on the quality of the data, as can be attested to by employees who use the data for analysis as well as by the Risk contractor. This void has to be filled permanently: updated rules need to be written and the authority and QA routines have to be housed somewhere. It seems reasonable that the mod partners who are doing COD implementation would be involved in crafting these solutions, since, with the advent of COD, PEPS suddenly becomes an enterprise-wide piece of the modernization.</p>	2	29	Kitty Wooley	9-Jan	N	Comment noted, since out of immediate scope of COD, we will log the risk, gather information, and investigate further. No change to document needed.

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51	Although the plan is focused on performance of all types, I am not seeing anything that talks about SFA's ability to run continuous or ad hoc tests on the system itself, once it is in production and the IV & V testing is finished. By "system" I mean COD plus VPN plus EDEExpress and any other piece that we "own," that stands between us and the school. Is this included in the plan, and I just don't recognize it?	2	29	Kitty Wooley	9-Jan	N	After follow-up discussion with Kitty, she is looking for system performance measurements and this will be part of system requirements gathered for COD. No change to document needed.
52	Are we assuming that the VDC will be able to run the particular statistics that are needed by the enterprise, based on both past experience and best-in-business practice? If the latter, have we verified that this is a safe assumption? If the answer is no, I think this should be added to the plan.	2	29	Kitty Wooley	9-Jan	Y	The COD solution will be located at the preferred solution provider's location and not at the VDC, and therefore statistics should come from the preferred solution provider.
53	Add Fund Accountability to "Develop consistent and reusable data definitions..."	2	29	Ron Ackermann	9-Jan	Y	
54	Clarify that fund accountability and management is only for Pell and Direct Loans.	2	30	Mary Haldane	9-Jan	Y	
55	First bullet under Fund Accountability... - funding is tracked at the school/institution level, not the student level.	2	30	Ron Ackermann	9-Jan	Y	Clarification made. COD will receive detailed student records and will be able to track at the student level, but will provide data to FMS at the school level.

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56	third bullet – the FMS will feed ED-CFO general ledger information. It is not a subledger to ED-CFO system.	2	30	Ron Ackermann	9-Jan	Y	Removed bullet
57	What is the relationship to the COD call center/customer service function and the SFA Call Center IPT? Will the CSP be expected to adhere to recommendations for software/hardware/equipment?	2	31	Karen Sefton	9-Jan	N	We expect to integrate the COD call center with the SFA-wide approach for call centers. The plan for integration will be determined with our COD solution partners and SFA going forward.
58	Add to On-line Access – Aid in school reconciliation and funds tracking.	2	31	Ron Ackermann	9-Jan	Y	
59	Section 3.1.2 states that schools the develop their own software may wait until 2003-2004 to use COD because of the overlap between 2001-2002 and 2002-2003. If the Schools software is award year specific like EDEExpress, this statement may not be entirely accurate from a system perspective, although it may be accurate from a process perspective.	3.1.2	32	Frank Kidd	9-Jan	N	What was implied was that schools might need until 2003-2004 to modify their systems in order to have the ability to send the common record to SFA. You are correct that in the overlap schools will have to support 2 versions of software - one that creates previous legacy records and one that create common records.
60	If schools need to change their self-developed software, what support will SFA provide to them besides providing test environment?	3.1.2	32	Julie Bryant	9-Jan	N	Support will be defined later during the setup of the testing environment with SFA-CIO and is not fully known at this point.

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61	Section 3.1. Need to address EDEExpress-they have a rigid development schedule. It's unclear when EDEExpress is expected to have a COD module.	3.1	32	Karen Sefton	9-Jan	N	We are investigating whether or not the development of the EDEExpress application can be done in this timeframe. Katie and Gene are developing a Pro's and Con's list to help determine this.
62	There is an assumption that the testing will be accommodated by the test environment being built by SFA CIO. Need to bring them into the COD conversations-the work they are planning is for the current environment.	3.1	32	Karen Sefton	9-Jan	N	Yes, we are initiating discussions to coordinate with testing needed for COD. Comment noted but no change to document needed.
63	Software vendors want COD conceptual design in March at next vendor conference.	3.1	32	Karen Sefton	9-Jan	N	We will coordinate with Mary Haldane on this point. Comment noted but no change to document needed. During a follow-up meeting, Karen echoed vendor's concerns regarding advanced notice to support their schools, especially if they were schools included in the 02-03 pilot.
64	Add the Appendix letter.	3.1.2	32	Mary Haldane	9-Jan	Y	This reference was inadvertently left in the text and has been removed.
65	The plan addresses the issue of the need for the FFEL participants that adopt the COD process to modify their systems in processing the Common Record but does not include the mode of communication that will be used to initiate this involvement.	3.3	33	Denise Merchant	9-Jan	N	At this point the mode of communication has not been determined and will be developed in more detail as this plan is created.
66	Does this exclude FFEL and Perkins?	4.1	33	Julie Bryant	9-Jan	N	Perkins is definitely included in COD. The possibility for including FFEL exists but there is nothing definitive at this point.

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67	CFO, you do not discuss FISAP, Commitment transaction entries, and obligation transaction entries.	4.3	33	Julie Bryant	9-Jan	N	This is not in COD's scope. The data is shared between Campus Based and FMS.
68	Potential Impacts to Other SFA Business Processes. There is an assumption that the DLSS will not be impacted. Is this a reasonable assumption?	4	33	Karen Sefton	9-Jan	N	Yes, at this point since the assumption is that we will send DLSS the same information that it expects now via the EAI Bus. Since DLSS is expected to hook into the EAI Bus before COD goes live, a direct interface will not need to be developed with COD, although the functionality to send data via the EAI Bus from COD to DLSS will need to be tested.
69	Students Channel should be capitalized.	4.1	33	Mary Haldane	9-Jan	Y	
70	Under 4.3 include as interfaces on-line access, funding information, drawdowns, reconciliation.	4.3	33	Ron Ackermann	9-Jan	Y	
71	Section 5.2 states that CPS will provide eligibility information to COD. Currently CPS only provides eligibility data for to RFMS for Pell Grants, but not for Direct Loans. An SFA staff member feels that this is a shortcoming in the Direct Loan program. COD could provide an opportunity to create a Direct Loan eligibility check process via CPS.	5.2	34	Frank Kidd	9-Jan	N	Yes, COD will use CPS data to determine eligibility for Pell and Direct Loan but will use the current ISIR data. We will determine if there are any additional requirements for the Direct Loans in the Requirements and Design Phase.

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72	If the COD team decides to establish a Direct Loan eligibility check process, it will need to present the requirements to CPS by the end of March because I believe the annual CPS requirements meeting in April. The COD EDEExpress requirements may also need to be presented during that timeframe.	5.2	34	Frank Kidd	9-Jan	N	We plan to use the data stream based on the current ISIR and therefore no changes are needed to CPS at this point.
73	The close out dates may be a bit ambitious.	5.1	34	Julie Bryant	9-Jan	N	At this point we are discussing with DL and Pell on data migration and retirement of these systems. As the approach is developed, the implementation workplan will be modified.
74	Section 4.4 Schools Channel. Need to add specific references for reimbursement analysts who interface directly with RFMS to release Pell funding for reimbursement schools. There is an assumption in this section that case management uses Pell and LO data for information only. Also, include that Reimbursement Analysts' interfacing with Direct Loans to release Direct Loan funding for reimbursement schools.	4.4	34	Karen Sefton	9-Jan	Y	This point has been added to Section 4.4
75	Section 5 Retirement of RFMS and LOS. Need to keep them for contingency operations instead of retiring them according to Plan dates.	5	34	Karen Sefton	9-Jan	N	At this point we are discussing this with DL and Pell on data migration and retirement of these systems. As the approach is developed, the implementation workplan will be modified.
76	First paragraph, add Customer Service Call Center to the areas affected.	4.4	34	Mary Haldane	9-Jan	Y	Added

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77	Second paragraph, omit that the CAMs will responsible for training.	4.4	34	Mary Haldane	9-Jan	Y	CAMs and TOs have not been committed (identified by Mary in comment #26), so "SFA Staff" has been used instead.
78	Add to fourth bullet under 5.2 – Provide data for school reconciliation, funds tracking and drawdown information.	5.2	34	Ron Ackermann	9-Jan	Y	
79	Is NSLDS in the “to be SFA Data Warehouse? What will be the official subsidiary record?	5.2	35	Julie Bryant	9-Jan	Y	Yes - NSLDS is in the Data Warehouse (this was changed on the diagram)
80	Figure 6: COD Interfaces to Other SFA Systems. NSLDS is missing.	5.2	35	Karen Sefton	9-Jan	Y	Yes - NSLDS is in the Data Warehouse (this was changed on the diagram)
81	SFA, need to discuss CFO’s role and skill requirements	7.1	36	Julie Bryant	9-Jan	Y	We are working with Mary Haldane to get SFA personnel staffed as soon as possible.
82	The Implementation Plan refers several times to the analysis pending from the Analysis Division that will provide guidance on regulatory and statute changes. Since the workgroups are on hiatus, we need to check their progress.	6	36	Karen Sefton	9-Jan	N	The workgroups are being reorganized based on any regulatory or statute changes. We will follow-up through Mary to check their progress.

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	Suggested Changes	Section	Page	Author	Date	Change Made Y/N	Comments
83	Section 7 Resources and Skills. Need to identify/hire these people.	7	36	Karen Sefton	9-Jan	N	We are working with Mary to get SFA personnel staffed as soon as possible.
84	Last sentence, omit "that."	6	36	Mary Haldane	9-Jan	Y	
85	Add an estimated time for having NPRMs out in order to get final regulations by 11/1/01	6	36	Mary Haldane	9-Jan	Y	Schedule for notice of Need of Proposed Rule-Making in order to meet 11/1/01 date was added.
86	Add Campus-based, DLSS and CPS to the list of SFA subject matter experts.	7.1	36	Mary Haldane	9-Jan	Y	
87	7.1: page 37, change first sentence not in a box to "These SFA roles will be needed ..."	7.1	37	Mary Haldane	9-Jan	Y	
88	Section 8 Training. Need to see more about this Gap Analysis and get the Union on board. There is recognition within the Plan that the Union could be a barrier, but no real mitigation strategy. SFA folks need to get the People Part moving independent of MP activities.	8	39	Karen Sefton	9-Jan	N	Yes, we agree that the Union needs to be more involved and that SFA can work on this independent of MP activities.
89	Section 9.Implementation Risks. Risk 1-why does the MP assume that they will not have access to SFA staff to determine training requirements?	9	40	Karen Sefton	9-Jan	N	Based on previous attempts, it has been difficult accessing SFA staff. No change to document required.
90	Mitigation of Risk 7 is to hire dedicated SFA staff to support COD	9	41	Karen Sefton	9-Jan	Y	
91	Change ability to control for #4 to low.	9	41	Mary Haldane	9-Jan	Y	

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	Suggested Changes	Section	Page	Author	Date	Change Made Y/N	Comments
92	Would CMM mitigate #5?	9	41	Mary Haldane	9-Jan	Y	Added "including CMM"
93	Add identifying specific SFA COD full-time staff to the mitigation strategy for #7.	9	42	Mary Haldane	9-Jan	Y	See comment 91--"Identify specific SFA full-time staff to support COD" bullet added
94	Number 9, omit the first "interface" and change the ability to control to low.	9	42	Mary Haldane	9-Jan	Y	
95	Add transition of customer service to #4.	10	42	Mary Haldane	9-Jan	Y	
96	Appendix B, page 2, why is SFA not checked for coordination and team building with key stakeholders?	Appendix B	44	Mary Haldane	9-Jan	Y	
97	There are several references to Career Development Program for SFA staff, which includes recruiting by SFA Human Resources. One of the key assumptions of the Plan is that there will be a gap analysis performed on every individual involved in Pell/Direct Loan/Campus Based delivery. This initiative needs to get underway if it is to have union buy-in and employee buy-in. There are also references to an "employee development center". What is that and when will employees be able to take advantage of it?	Overall	13, 16, 46	Karen Sefton	9-Jan	N	This topic was discussed at a School's Channel Manager's meeting in early January. This initiative being headed by SFA HR and is still in early stages with the Union involved. Karen feels that there is a lot more work needed to be done in this area.

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	Suggested Changes	Section	Page	Author	Date	Change Made Y/N	Comments
98	<p>There are too many major assumptions that are not in concert with the vision of the project sponsor.</p> <p>a) Retirement schedule of the legacy systems</p> <p>b) EDEExpress- Schedule of 2002-2003 version which will support COD with a new interface, edits, and common record format.</p> <p>c) Exclusion of the VDC as a data operations facility for COD</p> <p>d) Although a test approach is defined, the dependency on SFA CIO to do testing and to setup a test environment to support testing needs of schools, third party vendors and servicers is a major RISK.</p>	Overall	Overall	Denise Merchant	9-Jan	N	<p>a) We are discussing legacy systems and retirement dates to determine what are the current requirements.</p> <p>b) This is will be determined as mentioned in the Next Steps section of the Executive Summary.</p> <p>c) See Steve Hawald's comment (#110)</p> <p>d) Noted, and we will begin discussions with the SFA CIO.</p>
99	The Implementation plan does not include a Security Plan in any of the development efforts. Security assessment and planning needs to be included. A security officer should be added to the resource list.	Overall	Overall	Denise Merchant	9-Jan	Y	Added to "Next Steps" and will be fully addressed later.
100	Needs to state in compliance with · American's With Disabilities Act · SFA's CIO Technical Infrastructure	Overall	Overall	Julie Bryant	9-Jan	N	After a follow-up meeting with Julie, she stated that COD must be accessible by the Disabled (eg. Blind, Deaf). No change to document needed, we will pass this issue to the functional requirements team.
101	No mention of Disaster Recovery Plans	Overall	Overall	Julie Bryant	9-Jan	N	COD Solution partners have told us that they have disaster recovery plans in place. We will follow-up to verify these plans.

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	Suggested Changes	Section	Page	Author	Date	Change Made Y/N	Comments
102	No mention of security of system or data	Overall	Overall	Julie Bryant	9-Jan	Y	Added to "Next Steps" Will be fully addressed later.
103	Does COD also cover Perkins Loans?	Overall	Overall	Julie Bryant	9-Jan	N	Yes, this is part of the detailed student record detail that will be sent to COD for campus-based programs. Comment noted but no change to document needed.
104	In all instances where Funds' Accountability and Management is discussed, we need a strong CFO presence.	Overall	Overall	Julie Bryant	9-Jan	N	Noted, we are working with Mary Haldane to get SFA personnel staffed as soon as possible.
105	I believe the deliverable title should be phase II not phase III per TO#19. Also, in the letters to Carol, the deliverable number is 19.1.07, and I believe it should be 19.1.7 per TO#19.	Overall	Overall	Mary Haldane	9-Jan	Y	Changed the Phase number but did not change the TO# since the cover letters have already been signed as of first delivery.
106	Add the section numbers to the pages. This will make it much easier to use.	Overall	Overall	Mary Haldane	9-Jan	Y	Put in section breaks
107	Security and Continuity of Operations Plan need to be added.	Overall	Overall	Mary Haldane	9-Jan	Y	Added to "Next Steps" Will be fully addressed later.
108	A requirement of the FMS is the ability to "drill down" from transactions recorded in the General Ledger to the transaction level detail. The means of accomplishing this is not stated in the implementation plan.	Overall	Overall	Ron Ackermann	9-Jan	N	Correct, this type of detail will be gathered as part of functional and system requirements. Noted and will be passed to our functional requirements team. No change to document needed.

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	Suggested Changes	Section	Page	Author	Date	Change Made Y/N	Comments
109	The Campus Based Systems (CPS) is a major reengineering effort and not a replatformed effort as discussed on pg. 3	1.2.1	3	Steve Hawald	24-Jan	Y	Change made on page 3
110	The COD application is more of an ASP model where we are using services, not buying Total Systems software thus not using the VDC to host. We don't define this concept clearly and it reads like a lightning rod for all the legacy operators to stop using the VDC was my first take on page 4.	1.2.2.1	4	Steve Hawald	24-Jan	Y	Change made on page 4
111	We need your COD Team to better understand the roles of IT Services as to work with the COD tech team to have to communication properly designed and installed for the VDC and have them on all the appropriate project schedules, page 6 does not define the right resources and page 37 does. This is also consistent with IT Management Team that needs to validate the SFA standards, policies and target enterprise architecture and ensure that we comply with all fed regs like Clinger Cohen etc. is missing like it does not exist at SFA. This would be a lightning rod for an IG review on this product/service. We need to incorporate the roles and responsibilities of the three teams. IT Management Team - for policies, standards, architectures and govt regs compliance. IT eCAD Team - IV&V is covered by Configuration Management Plan and Review, Product Readiness Review, Product stress and performance testing, and Post audit review are all missing from this team and IT Services Team - assist in planning, design, and VDC production readiness for communications, capacity/performance, EAI, and other services required for COD data and connectivity as well as any desktop services requirements. Some IT Services items are on the migration schedules for VDC efforts but miss the upfront planning schedules which wreck all product delivery dates.	1.2.2.1 and 7.1	6, 37	Steve Hawald	24-Jan	Y	Added on pages 6 and 37

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	Suggested Changes	Section	Page	Author	Date	Change Made Y/N	Comments
	Changes Incorporated into Document		67				
	Changes Not Incorporated into Document		44				
	Total Comments		111				